

NASA SHARED SERVICES CENTER

**Financial Disclosure – Annual
(25.1)
Service Delivery Guide (3.2.3.6)**

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Financial Disclosure - Annual

Introduction

Public and confidential financial disclosure serves to prevent conflicts of interest and to identify potential conflicts, by providing for a systematic review of the financial interests of both current and prospective officers and employees. These reports assist agencies in administering their ethics programs and providing counseling to employees.

There are two types of financial disclosure reports, public (SF-278) and confidential (OGE-450). As the names imply, public financial disclosure reports may be released to the public. Confidential financial disclosure reports are not released to the public.

Who Must File:

[Public Financial Disclosure Report, SF 278](#): The following individuals are subject to filing an SF-278:

- a. Presidential nominees to positions requiring the advice and consent of the Senate.
- b. Officers and employees, including Special Government Employees (SGEs), whose positions are classified above GS-15 of the General Schedule, or whose rate of basic pay under other pay schedules is fixed at a rate equal to or greater than 120 percent of the minimum rate of basic pay for GS-15 (this includes members of the Senior Executive Service), military personnel serving in pay grades O-7 or above, and employees in any other position determined by the Director of OGE to be of equal classification.
- c. Administrative Law Judges.
- d. Employees of the excepted service in positions that are of a confidential or policymaking character, unless the Director of the OGE has excluded their positions.
- e. The Designated Agency Ethics Official.
- f. Intergovernmental Personnel Act employees paid at or above the SES level.

[Confidential Financial Disclosure Report, OGE 450](#): Confidential filers are determined by their official responsibilities. All Deputy Directors, Associate Directors, Division Directors, contract officers, program managers, and others in

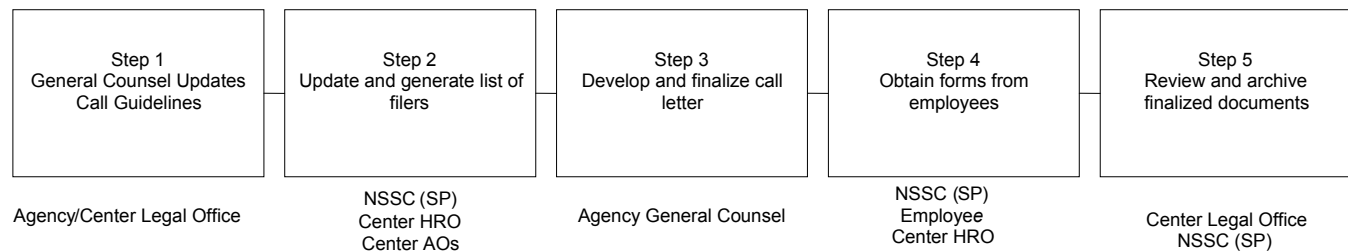
similar positions who make decisions affecting non-federal entities meet the criteria for filing the Confidential Financial Disclosure Report. See NPR 1900.3A, Chapter 4, for a detailed explanation of positions subject to filing confidential financial disclosure reports.

When Must These Reports Be Filed?

Public financial disclosure reports are filed annually in May. New and terminating public filers also must file a new/termination report within 30 days of the action. Depending on the timing of the termination, a single combined report may be filed to meet the annual and termination requirements. The period covered by the annual report is normally the previous calendar year.

Confidential financial disclosure reports are filed annually in February. New employees in covered positions or employees who move into covered positions must file a new entrant report within 30 days of beginning the new position, unless their previous position was also a covered position.

This process guide is divided into three sections. Section 25.1 addresses the Annual Process, 25.2 addresses initial movements in positions that require Financial Disclosure, and 25.3 addresses SF-278 filers who separate from their positions. The NSSC will use the Ethics Program Tracking System (EPTS) and work closely with Center Human Resources Offices (HRO) to identify and notify employees who are required to file financial disclosure reports, ensure that filers complete reports properly and within the time parameters, provide the forms to the Center's Chief Counsel for review, and archive finalized documents.

Process – Overview of Financial Disclosure - Annual**Roles & Responsibilities**

Roles and Responsibilities	Action	Tips
Step 1 Center Legal Office Notifications of guideline	The Agency Legal Office is responsible for ensuring that NSSC is aware of any changes to Financial Disclosure regulations or call guidelines. To ensure consistency, HQ Office of General Counsel shall provide NSSC guidance, updated requirements and changes as effected. Output: Changes to call guidelines/regulations	NSSC should establish a regular schedule to review the Office of Government Ethics website, in order to identify changes that could impact the NASA process.
Step 2 NSSC (SP) Center HRO Center AOs Generate list of filers	Centers are responsible for completing the Financial Disclosure field in the Federal Personnel Payroll System (FPPS) when employees move into positions that are covered by the Financial Disclosure regulations. EPTS is populated from FPPS data, such that EPTS should identify the majority of filers from the FPPS data. Because of the wide variety of persons who may need to file OGE-450 (determined by their responsibilities), Centers will need to confirm that EPTS is complete. NSSC (SP) develops and sends a call letter to Center HR offices requesting them to update EPTS with respect to OGE-	Relevant policy directives: NPD 1900.9D NPR 1900.3A CH.4 5CFR Part 2634 Also see: www.usoge.gov Note: NSSC (SP) must ensure that the OGE-450 list is updated in sufficient time to enable notification to all filers by December 15 of each year.

Roles and Responsibilities	Action	Tips
	<p>450 filers. The Center HRO sends the call letter to the appropriate Administrative Officers (AO) in organizations requesting that they generate a report from EPTS, and provide the report to the supervisors to identify who should file. The Center AO's update the EPTS as appropriate and notify the Center HRO of changes. The Center HRO updates FPPS as required and informs NSSC (SP) that the updates are complete. NSSC (SP) generates lists of filers for OGE-450 and SF-278 from EPTS.</p> <p>Output: List of filers from EPTS</p>	<p>Centers should not need to update EPTS for SF-278 filers as EPTS should capture this category of employees from FPPS.</p> <p>Employees who need to file OGE-450's can also be determined from supervisor review of position descriptions.</p> <p>Decision is made on position, not person.</p>
<p>Step 3</p> <p>NSSC (SP) Agency General Counsel</p> <p>Develop and finalize Call Letter to employees</p>	<p>NSSC (SP) develops a draft call letter (email) for both OGE-450 filers and SF-278 filers for the Agency Office of General Counsel (OGC) to review. Call letters will be drafted in sufficient time to enable review and approval before the planned notification date to filers. OGC reviews and approves the call letters before release to employees. OGC maintains additional information for all filers on their website. OGC will provide a link to this information on their website and ensure that the link is up to date. NSSC finalizes the call letter.</p> <p>Output: Finalized Call Letter</p>	<p>Ensure that draft call letters are prepared in sufficient time to ensure approval before the planned distribution date.</p>
<p>Step 4</p> <p>NSSC (SP) Employee Center HRO</p>	<p>The NSSC (SP) sends an email through EPTS to filers, no later than March 15 or December 15, depending on the form being completed. NSSC (SP) monitors the EPTS to ensure all filers complete all</p>	<p>Employees required to file SF-278 will be notified by March 15 of filing deadline.</p> <p>SF-278 filers will</p>

Roles and Responsibilities	Action	Tips
Employees are notified and complete forms	<p>required fields on the form, sign the form, and submit the form within the time period allowed. NSSC (SP) also reminds employees of the filing deadline. NSSC (SP) resolves any issues with the employees and sends reminder emails to employees of the filing deadline as needed. Once submissions are received and reviewed, NSSC logs the receipt date of submissions into the database. When NSSC logs the receipt date NSSC is also indicating that they have reviewed the document. The receipt of form must be logged in within two (2) days. If an employee refuses to submit the required form, the NSSC (SP) notifies the Center HRO and the Center HRO contacts the employee's supervisor.</p> <p>The employee follows the instructions in the email to access the electronic form. Any questions about completion of the form will be directed to the NSSC (SP) for resolution. The employee finalizes and signs the form electronically.</p> <p>Output: Finalized and Signed Form</p>	<p>receive reminder by April 15.</p> <p>Employee faces \$200.00 fine if SF-278 is not filed by close of business June 15, unless an extension is received from the OGC.</p> <p>Employees required to file OGE-450 will receive advance email by December 15.</p> <p>OGE filers will receive notification with forms by January 15.</p> <p>Employees must file OGE-450 by February 15. OGC can give extension upon request by employee, if request in advance of filing deadline.</p> <p>EPTS has a block for the date received; a date shown in this block also indicates that NSSC has reviewed the submission.</p>
<p>Step 5</p> <p>Center Legal Office</p> <p>Review and Archive Finalized</p>	The Center Legal Office reviews submissions for accuracy and completeness as well as resolving any issues with the employee. They determine if conflicts exist and what resolution is needed. If there are potential conflicts, the Center Legal	Only the Agency General Counsel reviews the Center Director, Deputy Center Director and Chief Counsel submissions.

Roles and Responsibilities	Action	Tips
Documents	<p>Office prepares and submits a Cautionary Letter to the employee. Letters are stored in the system form archive and the NSSC (SP) archives the documents electronically.</p> <p>Output: Finalized Documents</p>	

Metrics

Initiating Office/Entity	Deliverable (Output)	Receiving Office/Entity	Metric
NSSC (SP)	Call Letter to Center HRO to update OGE-450 filer list in EPTS	Center HRO	At least two (2) weeks before the filers are to be notified.
Center HRO	Finalized list of filers	NSSC (SP)	Within two (2) weeks of receiving the request for update of filers.
NSSC (SP)	Finalized Call Letter	Employees	SF-278 filers notified by March 15; reminder by April 15. OGE-450 filers receive advance email by December 15; receive notification with forms by January 15.
NSSC (SP)	Receipt logged in EPTS	NSSC (SP)	Within two (2) days of receipt.

Privacy Data

All participants involved must ensure protection of all data covered by the Privacy Act.

System Components**Existing Systems**

IT System Title	IT System Description	Access Requirements	IT System Interfaces
EPTS	EPTS for all NASA SF-278 and OGE-450 filers	Internal and External NSSC customers	TBD

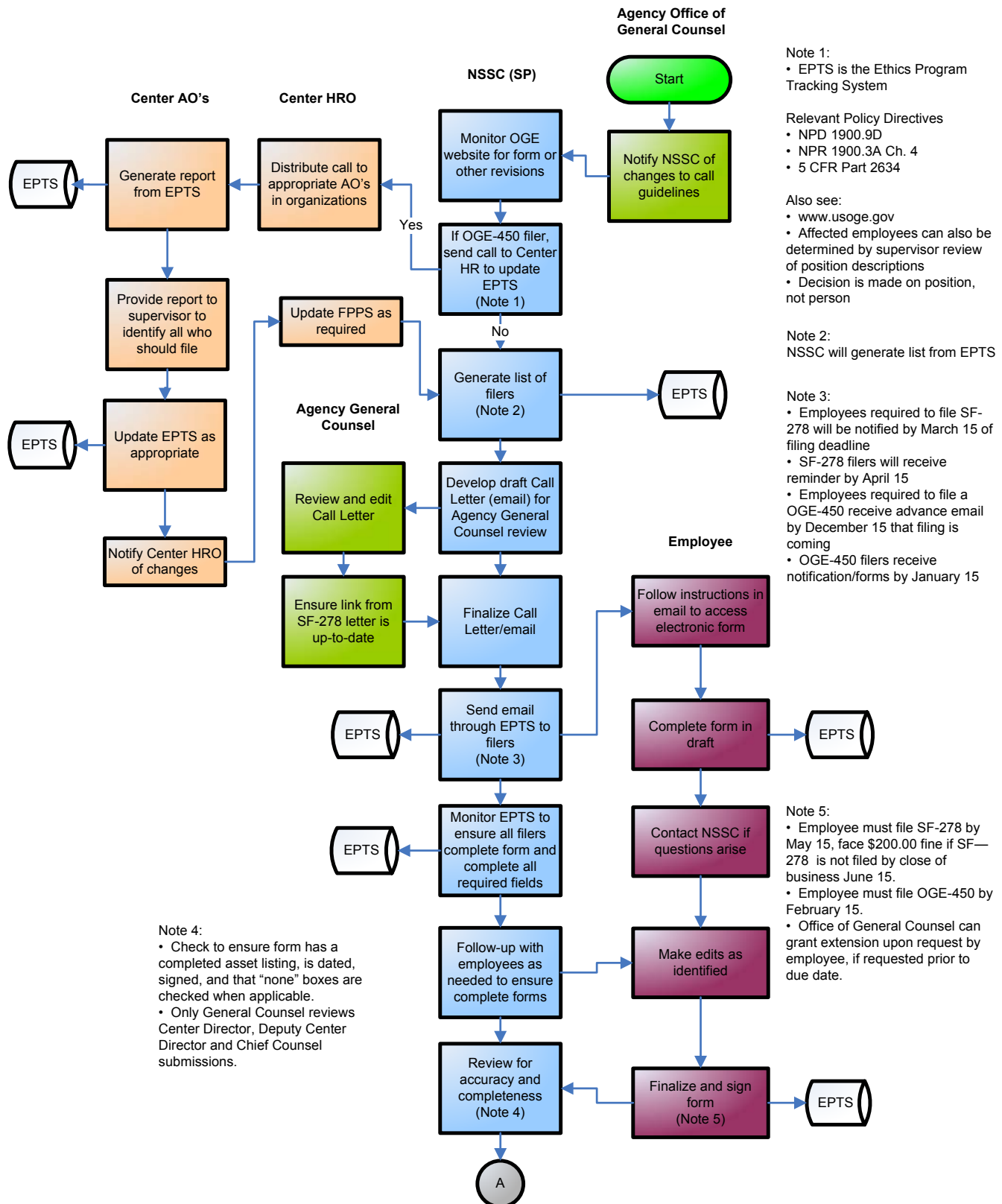
New Systems

None Identified

Generic System Title	Business Requirements for System	Access Requirements	IT System Interfaces
N/A			

Contact Center Strategy

Each activity requires a clearly defined contact center strategy which answers the question, “Who will answer the call and handle the request” and defines the escalation parameters for the activity. Because of the varied nature of the NSSC’s activities and volume of transactions, each activity has a unique Contact Center strategy. Refer to the NASA Shared Service Center Customer Contact Center Service Delivery Guide (3.5.1) for the Contact Center strategy concerning this activity.

Appendix – Process Flow Diagram**Financial Disclosure - Annual Process**

Financial Disclosure - Annual Process

NSSC (SP)

